



SAN LUIS OBISPO COUNTY HEALTH AGENCY

Health Agency - Behavioral Health Department

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To: James P. Erb, CPA, Auditor-Controller-Treasurer –Tax Collector

From: Jeff Hamm, Health Agency Director

Date: August 29, 2016

Subject: Response to Mental Health Services Act Performance Audit

This letter is in response to Mental Health Services Act Performance Audit report dated August 11, 2016 for the audit period of FY 2014/15. This letter provides detailed responses to each of the findings and recommendations in the report. The Department appreciates the time and effort that was put into the audit, as well as the issues that were highlighted and recommendations that were provided by the Audit Team.

In an effort to improve the oversight and monitoring of contracts, the Behavioral Health Department is currently working on a Contractor Compliance Plan (Plan) which will include written expectations of the contract monitor, as well as monitoring and auditing tools in the following three areas: fiscal, program, and quality assurance/utilization review. The Auditor's recommendations under Suggested Improvements and Findings in the report have been taken into consideration while developing the Plan. Additionally, the contractor questionnaire that the Auditors used during the MHSA audit has been incorporated into the Plan as an auditing tool.

CONTRACTOR RESULTS

- Family Care Network (FCN), Inc. Finding #1: Underutilization of Services
Recommendation: We recommend the Behavioral Health Department develop a plan for consistent referrals for youth to program services that will not be interrupted by staffing changes.

Response: Although the Department is in agreement of the recommendation, it is at

times challenging to provide consistent referrals when there are staff vacancies in an intensive program, such as the Full Service Partnership (FSP). Referrals are not made to the program if the capacity to provide appropriate levels of care is diminished because of a staff shortage. The Department will make every effort to better utilize temporary staff or clinical student interns (e.g. MFT-I) to fill the gap when needed. The Department will also look more closely at utilizing other available FSP therapists that are not at capacity and have them serve clients outside of their area until vacancies are filled.

- Silvia Ortiz, Ph.D. Finding #1: Contracted Service Not Provided

Recommendation: We recommend MHSA staff follow-up with contractors at the first indication a contracted service may not be performed.

Response: The Department agrees with the recommendation. The Plan will require regular quarterly meetings with contractors in the future and will include a review of services, outcomes, and finances, as well as other items that need further discussion. These regular meetings should ensure that contracted services are being provided.

- Silvia Ortiz, Ph.D. Finding #2: Unable to Substantiate Costs

Recommendation: We recommend Dr. Ortiz keep supporting documentation for services provided to the MHSA program including time and attendance records, billing rates, time and location of travel or other supporting documentation detailing the nature of services provided, and MHSA staff periodically check the supporting documentation.

Response: The Department agrees with the recommendation and has already begun to periodically request supporting documentation for invoices. Also, the Plan will require an annual audit for all contractors, which will include a review of supporting documentation for invoices. This will ensure the Department is able to substantiate all costs billed to the County for services.

- Silvia Ortiz, Ph.D. Finding #3: Lack of Communication between Contractor and MHSA staff

Recommendation: We recommend regularly scheduled meetings with Dr. Ortiz be instituted by Behavioral Health staff. Meetings should include a review of all contract expectations.

Response: The Department agrees with the recommendation. As noted in the Response under Finding #2, the Department will require contract monitors to hold quarterly meetings with contractors during the contract year. This will ensure there is sufficient communication between the contractor and staff.